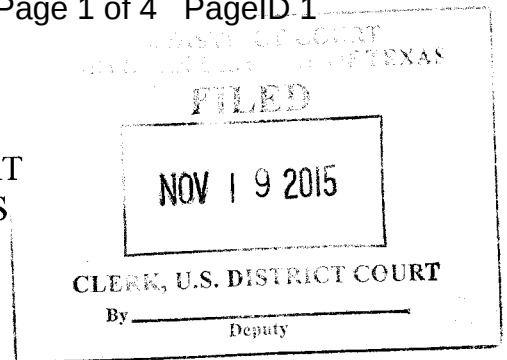


UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

Case No: 4:15-MJ-512

JESUS EMMANUEL GONZALEZ-RODRIGUEZ (01)
RICHARD LARA (02)

CRIMINAL COMPLAINT

I, the undersigned, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about November 18, 2015, in the Northern Judicial District of Texas, **JESUS EMMANUEL GONZALEZ-RODRIGUEZ** and **RICHARD LARA**, defendants, unlawfully conspired to possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)).

I, Special Agent M. Finney, Affiant, under oath, duly state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and that the statements set forth in this affidavit are true and correct to the best of my knowledge:

1. Beginning on November 17, 2015 and continuing through November 18, 2015, through a series of recorded telephone calls, an undercover officer (UC) ordered three (3) kilograms of methamphetamine from an unknown individual, later identified as JESUS EMMANUEL GONZALEZ-RODRIGUEZ, who agreed to sell the methamphetamine for \$9300.00 per kilogram.
2. On November 18, 2015, the UC and GONZALEZ-RODRIGUEZ agreed to meet at Lowe's, located at 1111 Eastchase Parkway, Fort Worth, Texas to conduct the transaction. Agents/Officers with the Drug Enforcement Administration (DEA) established surveillance at the specified location.

GONZALEZ-RODRIGUEZ told the UC that he was driving a grey truck and the UC told GONZALEZ-RODRIGUEZ to meet his runner, a Cooperating Source (CS), who was driving a specified vehicle. Subsequently, at approximately 6:14 p.m., GONZALEZ-RODRIGUEZ advised the UC that he was taking the exit to arrive at the Lowe's.

3. At approximately 6:16 p.m., Agents/Officers observed a silver Lexus Sport Utility Vehicle (SUV), bearing Texas license plate GHC 9085 arrive at the Lowe's parking lot and pull alongside the specified vehicle. GONZALEZ-RODRIGUEZ exited the vehicle and met with the CS to discuss the transaction. The passenger of the vehicle, RICHARD LARA, did not exit the vehicle.

4. After the CS observed approximately three (3) kilograms of a substance believed to be methamphetamine, inside a trash bag, located inside a cardboard box, in the rear of the SUV, GONZALEZ-RODRIGUEZ and LARA were arrested without incident. During the search of the Lexus SUV, Agents/Officers located approximately three (3) kilograms of a substance believed to be methamphetamine, located inside gallon ziplock style baggies, which were inside a black trash bag, which was contained in a cardboard box, in the rear passenger compartment of the vehicle.

5. After being taken into custody, LARA was advised of his Miranda Warnings and requested an attorney. LARA was not asked any additional questions.

6. After being taken into custody, GONZALEZ-RODRIGUEZ was advised of his Miranda Warnings, stated that he understood his rights, agreed to waive his rights, and answer questions. While answering questions, GONZALEZ-RODRIGUEZ admitted that he traveled to Fort Worth, Texas from Dallas, Texas to conduct the sale of methamphetamine.

7. Through subsequent investigation, Agents/Officers learned that the kilograms of methamphetamine belonged to LARA and that LARA had additional kilograms of methamphetamine at his residence, located at 1831 Riverway Place, Dallas, Texas. At approximately 8:04 p.m., Agents/Officers obtained written consent to search the residence of LARA, located at 1831 Riverway Place, Dallas, Texas, from Maria Cazares, the mother-in-law of LARA, who also resides at the location.

8. During the search of the residence, Agents/Officers located approximately eight (8) kilograms of a crystal substance believed to be methamphetamine, packaged in gallon ziplock style bags, which were identical to the packaging of the three (3) kilograms which were found in the vehicle at the time of GONZALEZ-RODRIGUEZ and LARA's arrest. Further, approximately one (1) additional kilogram of a brown crystal like substance believed to be methamphetamine was located in the residence. Additionally, five (5) firearms were located along with the suspected methamphetamine.

9. On November 18, 2015, a presumptive field test was conducted on the substance brought to the Lowes by GONZALEZ-RODRIGUEZ and LARA, and it tested positive for the presence of methamphetamine.

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10. Based upon the above facts and circumstances, there is probable cause to believe that violated 21 USC 846, Conspiracy to Possess with Intent to Deliver a Controlled Substance, namely methamphetamine.

11/19/2015
Date

M. Finney
M. Finney
Special Agent
Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn to before me and subscribed in my presence, 19th day of November 2015,
at 2:25 a.m./~~p.m.~~ at Fort Worth, Texas.

Jeffrey L. Cureton
JEFFREY L. CURETON
United States Magistrate Judge